REMARKS

This responds to the Office Action mailed on <u>December 28, 2007</u>.

Claims 1, 6, 16, 30, 32, and 34 are amended based on an existing feature of claim 6, no claims are canceled, and no claims are added; as a result, claims 1, 3-35 stand pending in this application.

§103 Rejection of the Claims

Claims 1 and 3-35 were rejected under 35 U.S.C. § 103(a) as being unpatentable over <u>Grootwassink</u> (U.S. 7,031,705) in view of Albert et al. (U.S. 2003/0177389, hereinafter "Albert").

For the reasons that will be set forth below, Applicants respectfully submit that, in light of the amendment, this rejection is improper, and the identified claims are non-obvious over Grootwassink and Albert, and are therefore allowable. Rejections on obviousness grounds cannot be sustained by mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness. [1]

Amended claim 1 recites, in pertinent parts, "establishing a communications link with the client access device to authenticate and authorize the user, <u>including communicating an agent to the client access device, the agent operable to identify the client device configuration</u>." (Emphasis added throughout) The Office Action in rejecting claim 6, while discussing this limitation, asserts that Grootwassink at col. 2 lines 63-67 and col. 5 lines 6-10 as modified by Albert at paragraph 0067, lines 7-10, paragraph 0066, and FIG. 3 teaches the limitation. Applicants respectfully disagree with the assertion and specifically with the allegation that " the VLR communicates the client configuration data with HLR" [2] can read on the above claim limitation.

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[1] *In re Kahn*, 441 F.3d 977, 988, 78 USPQ2d 1329, 1336 (Fed. Cir. 2006)

[2] The Office Action, at page 5, 4th paragraph

Grootwassink in the cited passages provides that "the VLR sends the query directly to

the HLR." [3] However, the VLR in Grootwassink is not equivalent to the claimed *agent*

communicated to the client device, because VLR is part of mobile switching center (MSC):

> "when a wireless unit initiates a communication in a visited service area, the
> visited system service provider attempts to find the wireless unit's identification
> (also referred to as registration information) in the visitor location register (VLR)
> of an appropriate MSC in the visited system (MSC-V)." [4]

Accordingly, a VLR is a register of an MSC and cannot be equated with an *agent communicated*

to the client device. As such, Grootwassink fails to disclose the amended claim 1 limitation of

"*establishing a communications link with the client access device to authenticate and authorize*

the user, including communicating an agent to the client access device, the agent operable to

identify the client device configuration."

FIG. 3 in Albert is a block diagram of an environment in which security to a corporate

environment accessed by remote users may be provided. Albert, in paragraphs 0066 and 0067,

provides that "an integrity server or policy server ensures that all users accessing a particular

system or network comply with specified security policies." Albert further states "if a trigger

event occurs and a copy of a corporate security policy is not available on a client device, the

device may initiate a connection to an integrity server. In such event, corporate security policies .

. . are typically downloaded to his or her device" Albert continues by stating that "if other

security policies are also active on the client device when a new policy is activated, settings of all

currently active security policies are arbitrated and a merged policy is generated as a result."

However, downloading corporate security policies to a device does not amount to the claimed

feature of "communicating an agent to the client access device, the agent operable to identify the

client device configuration." As such, Albert does not teach the limitation of "*establishing a*

communications link with the client access device to authenticate and authorize the user,

including communicating an agent to the client access device, the agent operable to identify the

client device configuration," as recited in amended claim1. Accordingly, at least for the reasons

set forth above, Grootwassink as modified by Albert fails to teach or suggest each and every

element of amended claim 1. Therefore, Applicants respectfully submit that the difference

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[3] Grootwassink, col. 2, lines 63-67
[4] Grootwassink, col. 2, lines 47-52

between clamed subject matter of claim 1 and the disclosures in Grootwassink and Albert is significant and non-obvious to a person of ordinary skill in the art, at the time the application was filed. In addition, nothing in Grootwassink or Albert would provide a person of ordinary skill in the art with any reason to seek to combine the teachings of Grootwassink and Albert. As such, claim1 and its dependent claims 3-15 are not rendered obvious by the combination of Grootwassink and Albert, thus, are allowable.

The same arguments as presented with respect to claim 1 are also applicable to a consideration of amended claims 16, 30, 32, and 34. As such, Applicants respectfully submit that, for at least the same reasons noted above with respect to claim 1 , amended independent claims 16, 30, 32, and 34 and their dependent claims 17-29, 31, 33, and 35 are also allowable.

Accordingly, it is respectfully requested the claim rejections under 35 U.S.C. § 103(a) be reconsidered, in light of the amendments, and withdrawn.

CONCLUSION

Applicants respectfully submit that the claims are in condition for allowance, and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicants' attorney at 408-278-4053 to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 19-0743.

Respectfully submitted,

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Date __April 29, 2008__   By _/Ali Mireshghi/_____
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CERTIFICATE UNDER 37 CFR 1.8: The undersigned hereby certifies that this correspondence is being filed using the USPTO's electronic filing system EFS-Web, and is addressed to: Mail Stop Amendment, Commissioner of Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on this 29th day of April 2008.

Dawn R. Shaw   /Dawn R. Shaw/
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Name   Signature